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MICRON OPTICS, INC.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ROBERT L. CITROEN, LAW CORPORATION, a
Nevada Corporation,

Plaintiff,

vs.

MICRON OPTICS, INC., a Georgia
Corporation and JOHN DOES I through X,
ABC Corporations I through X, and Black and
White Companies I through X,

Defendants.

Case No. 3:16-cv-00570-RCJ-WGC

**STIPULATION TO EXTEND
DEADLINE FOR FILING JOINT
PRETRIAL ORDER**

[FIRST REQUEST]

MICRON OPTICS, INC., a Georgia
Corporation,

Counterclaimant,

vs.

ROBERT L. CITROEN, LAW CORPORATION, a
Nevada Corporation; ROBERT L. CITROEN,
an individual, DOES I-X, inclusive, and ROES
I-X, inclusive,

Counter-Defendants.

Plaintiff/Counter-Defendant ROBERT L. CITROEN, LAW CORPORATION and Counter-
Defendant ROBERT L. CITROEN (hereinafter collectively "Citroen") and
Defendant/Counterclaimant MICRON OPTICS, INC. (hereinafter "Micron"), by and through
their respective counsel, do hereby stipulate and agree to extend the deadline for filing the

1 joint pretrial order pursuant to Local Rule 26-4 by thirty (30) days.

2 On May 17, 2017, this Court issued an Order (ECF No. 90) denying Citroen's Motion
3 for Summary Judgment (ECF No. 76) and granting in part and denying in part Micron's
4 Motion for Summary Judgment (ECF No. 73). Pursuant to the parties' Joint Discovery Plan
5 and Scheduling Order (ECF No. 15), if dispositive motions are filed, the deadline for filing
6 the Joint Pretrial Order will be suspended until thirty (30) days after the decision on the
7 dispositive motions or further court order. Thirty (30) days after the Court's Order on the
8 parties' dispositive motions is Saturday, June 16, 2018. Therefore, the parties' Joint
9 Pretrial order is currently due on Monday, June 18, 2018.

10 In light of the Court's Order, the parties have consulted and are informally engaged
11 in attempts to resolve the matter. Additionally, the parties intend to retain a private
12 mediator (Hon. Brent Adams (Ret.)) to conduct a mediation in late June or early July,
13 which is the earliest that the parties can attend a mediation in Reno due to both parties'
14 representatives having to travel from out of state (i.e., Atlanta and California) and Mr.
15 Citroen's advanced age. In an effort to avoid additional attorneys' fees and focus on trying
16 to resolve the matter, the parties request a thirty (30) day extension of the deadline for
17 submission of the Joint Pretrial Order up to and including Wednesday, July 18, 2018.

18 In accordance with Local Rule 26-4, any further requests to extend any discovery
19 deadlines will be made no later than twenty-one (21) days before the expiration of the
20 subject deadline and must be supported by a showing of good cause for the extension.
21 This request for extension made by the parties is made in good faith and not for the

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1 purpose of delay. This request for an extension is limited to only those deadlines set forth
2 herein. The Court has not set a trial date for this matter.

Dated: May 25, 2018

3 Dated: May 25, 2018

4 /s/Stephen S. Kent, Esq.

5 STEPHEN S. KENT, ESQ.
6 KENT LAW, PLLC

/s/Sandra Ketner, Esq.

PATRICK H. HICKS, ESQ.
SANDRA KETNER, ESQ.
MONTGOMERY PAK, ESQ.

7 Attorneys for Plaintiff/Counter-Defendants
8 ROBERT L. CITROEN, LAW
CORPORATION and ROBERT L. CITROEN

LITTLER MENDELSON, P.C.
Attorneys for Defendant/Counterclaimant
MICRON OPTICS, INC.

9 **ORDER**

10 IT IS SO ORDERED.

11 Dated this 29th day of May, 2018.

12 William G. Cobb

13 UNITED STATES MAGISTRATE JUDGE

14 Firmwide:154950961.1 086337.1002